

Exhibit A

ORIGINAL

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

U.S. DISTRICT COURT NORTHERN DISTRICT OF TEXAS FILED SEP 24 2004 CLERK, U.S. DISTRICT COURT By _____ Deputy

UNITED STATES OF AMERICA	§	
	§	
v.	§	NO. 3:04-CR-240-G
	§	
HOLY LAND FOUNDATION FOR	§	
RELIEF AND DEVELOPMENT (1)	§	
also known as the "HLF"	§	
SHUKRI ABU BAKER (2)	§	
MOHAMMAD EL-MEZAIN (3)	§	
GHASSAN ELASHI (4)	§	
HAITHAM MAGHAWRI (5)	§	
AKRAM MISHAL (6)	§	
MUFID ABDULQADER (7)	§	
ABDULRAHAM ODEH (8)	§	

POST-INDICTMENT RESTRAINING ORDER

The United States has made an *ex parte* application to this Court, pursuant to 21 U.S.C. § 853(e)(1)(A), for a restraining order to preserve the availability of certain property that is subject to forfeiture in the above-styled criminal action. Upon consideration of the Government's application and the indictment of the HLF, it appears to the Court that there is reasonable cause to enter a restraining order to preserve the subject property based upon the following:

1. That a federal grand jury of this district has returned an indictment against the HLF and others on charges of money laundering, in violation of 18 U.S.C. § 1956. Furthermore, the indictment alleges criminal forfeiture under 18 U.S.C. § 982 of certain property identified in Attachment A of the Government's application, in addition to other property, in which the HLF holds an interest. Attachment A of the Government's application is hereby incorporated as part of this Restraining Order.

Certified a true copy of an instrument
on file in my office on 9/24/04
Clerk, U.S. District Court,
Northern District of Texas
By Sam Hubbard Deputy

2. That the federal grand jury's indictment of the HLF establishes sufficient probable cause for the issuance of this Restraining Order.
3. That in the event the HLF is convicted of the charges alleged in the indictment, the subject property would be subject to forfeiture under 18 U.S.C. § 982.
4. That the need to preserve the availability of the subject property through the entry of the order requested herein outweighs the hardship on any party against whom the order is to be entered.
5. That any third party claims to the subject property may be properly brought and resolved in ancillary proceedings conducted by this Court following the execution of a Preliminary Order of Forfeiture in accordance with the provisions of federal forfeiture law.

THEREFORE, IT IS HEREBY ORDERED AND DECREED:

That, effective immediately, the HLF, its agents, servants, employees, attorneys, family members and those persons in active concert or participation with the HLF, and those persons, financial institutions, or other entities who have any interest or control over the subject property are hereby

RESTRAINED, ENJOINED AND PROHIBITED, without prior approval of this Court, and upon notice to the United States and an opportunity for the United States to be heard, from attempting or completing any action that would affect the availability, marketability or value of said property, including but not limited to selling, transferring, assigning, pledging, distributing, encumbering, wasting, secreting, depreciating, damaging, or in any way diminishing the value of, all or any part of the property identified in governments Attachment A to its application.

IT IS FURTHER ORDERED that any financial institutions holding any accounts subject to this Order shall take no offsets against such accounts. They shall continue to credit

any deposits, interest, dividends, or other credits to such accounts in the normal course of business, and such deposits, interest, dividends, and other credits shall be subject to this Order. In addition, upon receiving notice of this Order, each financial institution shall promptly inform the Government as to the account balances at the time of notice, and shall thereafter supplement such information by reporting to the Government any changes to the accounts, and by responding promptly to requests by the Government for information on the accounts' current status.

IT IS FURTHER ORDERED that the United States or any Subject of this Order may seek modifications of this Order if it is deemed necessary by them to preserve their interest in the subject property.

IT IS FURTHER ORDERED that any Subject of this Order shall be permitted to execute a satisfactory performance bond pursuant to 21 U.S.C. § 853(c)(1) as an alternative to the restraint of the subject property. After notice to the United States and an opportunity to be heard, the Court shall determine whether any proposed bond is a satisfactory performance bond.

IT IS FURTHER ORDERED that the U.S. Marshal or the Secretary of Treasury, or their designee, shall promptly serve a copy of this Restraining Order upon the HLF and the institutions identified in the incorporated Attachment A to the Government's application, and shall make a return thereon reflecting the date and time of service.

THIS RESTRAINING ORDER shall remain in full force and effect until further order of this Court.

DONE this the 24 day of September, 2004.

A. Joe Fish
A. Joe Fish
Chief United States District Judge

ATTACHMENT A

Holy Land Foundation Accounts:

BLOCKING BANK	ACCOUNT NUMBER
Morgan Stanley New York, NY	115020379
Morgan Stanley - Discover Merchant payment	601101755229737
Fidelity Boston, MA	07287881
Hudson United Bank Mahwah, NJ	New account consolidating balances 4800685511 0220001581 0220001578 2840001218 4741822543
Bank of America - San Diego	2467302215 2467402205
Bank of America - Texas	004793910131
Bank of America - Florida	003871555929
all Bank of America accounts handled out of Concord, CA	
Chase Bank of Texas	38006302467
all Chase accounts handled out of New York, NY	38006302475
Standard Bank and Trust Hickory Hills, IL	New account consolidating balances 5402289001 5400954003 5400955000
Saturna Capital Bellingham, WA	12707-0011 12707-0010 Retirement accounts
North American Islamic Trust Burr Ridge, IL	76352 76343
MSI Housing Fund Houston, TX	HF-109
Citibank all Citibank accounts handled out of New York, NY	Akin-Gump Escrow 15118754
Republic National Bank of NY (HSBC) New York, NY	088033509